

**JENNIFER MOUZIS
MOUZIS CRIMINAL DEFENSE**

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Attorney for Defendant
STEVEN DANIEL WOODS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN DANIEL WOODS,

Defendant.

2:21-cr-00100-JAM

**STIPULATION AND
ORDER TO CONTINUE JUDGMENT
AND SENTENCING**

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Ross Pearson, and defendant, Steven Daniel Woods, by and through his counsel, Jennifer Mouzis, agree and stipulate to vacate the date set for judgment and sentencing, September 24, 2024 at 9:00 a.m., in the above-captioned matter, and to continue the judgment and sentencing to November 19, 2024 at 9:00 a.m. in the courtroom of the Honorable John A. Mendez. Supervising United States Probation Officer, Lynda Moore, also agrees to this change.

In addition, the parties stipulate to the following modification to the schedule of disclosure relating to the pre-sentence report ("PSR"):

Final PSR

October 29, 2024

Formal objections to PSR November 5, 2024

Reply, or Statement of Non-Opposition November 12, 2024

Mr. Woods was interviewed by Probation on April 29, 2024 with counsel present.

Counsel for defense has been in trial most of the summer and is starting another trial on September 30, 2024 for the case of *People v. Cummings*, Stanislaus Superior Court case number CR-20-010085). This trial is expected to last about 4 weeks. Once counsel is out of trial, she requires the requested time to gather and present mitigation evidence on behalf of Mr. Woods.

Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

IT IS SO STIPULATED.

Dated: September 17, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Ross Pearson
ROSS PEARSON
Assistant United States Attorney

Dated: September 17, 2024

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
STEVEN DANIEL WOODS

ORDER

For the reasons set forth in the accompanying stipulation, the judgment and sentencing date of September 24, 2024, at 9:00 a.m. is VACATED and the above-captioned matter is set for judgment and sentencing on **November 19, 2024, at 9:00 a.m.**

It is FURTHER ORDERED that the schedule of disclosure be **MODIFIED** as follows:

Final PSR **October 29, 2024**

Formal objections to PSR **November 5, 2024**

Reply, or Statement of Non-Opposition **November 12, 2024**

IT IS SO ORDERED.

Dated: September 18, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE